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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Applications of)	MM Docket No. 93-53
)	
KR PARTNERS)	File No. BPH-911001MB
)	
KES COMMUNICATIONS, INC.)	File No. BPH-911003MH
)	
LORI LYNN FORBES)	File No. BPH-911004MH
)	
For a Construction Permit for a)	
New FM Station on Channel 256C in)	
Waimea, Hawaii)	

To: Honorable Joseph P. Gonzalez
Administrative Law Judge

INTEGRATION AND DIVERSIFICATION STATEMENT

KR Partners ("KR"), by counsel and pursuant to the Presiding Judge's Prehearing Conference Order, FCC 93M-121, released March 25, 1993, and 47 C.F.R. Section 1.325(c)(2), hereby submits its Integration and Diversification Statement.

Respectfully submitted,

KR PARTNERS

By:



Mark Van Bergh
Richard H. Waysdorf

WAYS DORF & VAN BERGH
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1000 Connecticut Ave., N.W.

INTEGRATION AND DIVERSIFICATION STATEMENT

KR Partners ("KR") is a general partnership which has two general partners, Julie K. O'Connor and Nelson R. Parker. Ms. O'Connor has a 75% partnership interest, and Mr. Parker has a 25% partnership interest. Both Ms. O'Connor and Mr. Parker propose to work at KR's proposed station.

Julie K. O'Connor will work full-time, a minimum of 40 hours per week, as General Manager of the station, terminating her then current employment if KR's application is granted. Ms. O'Connor will have responsibility for determining and executing all station policies. She will plan and carry out the organizational structure of the station, recruit and hire all personnel in various areas of station operations, supervise the execution of duties by station employees, and will serve as the final voice in decision-making with regard to day-to-day matters and ultimate station policy.

Ms. O'Connor will claim credit for past local residence in the proposed service area from 1979 until approximately April 1990, and for residence in the community of license from approximately April 1990 to the present. From about October to December 1979 Ms. O'Connor lived with friends in Kailua-Kona, Hawaii, within the service area of KR's proposed station. The dates and locations of Ms. O'Connor's other residences within the service area and community of license are as follows:

- 1980-1982 - Royal Kailuan Condominium, Kailua-Kona
- 1982-1984 - Magic Sands Subdivision, Kailua-Kona
- 1984-1989 - Kona Highlands Subdivision, Kailua-Kona
- 1989-1990 - Kona Acres Subdivision, Kailua-Kona

1990-Present - Puu Nani Subdivision, Kamuela.¹

Ms. O'Connor will also claim credit for past broadcast experience working for station KLUA(FM), Kailua-Kona, Hawaii, from approximately November 1989 until September 1992 full-time, and subsequent to September 1992 part-time. From November 1989 until approximately June 1990, when KLUA began broadcast operations, Ms. O'Connor assisted in preparing the station for broadcast operations. She was responsible for organizing and establishing the station's office structure, including the hiring of office staff and obtaining equipment, furniture and supplies. Ms. O'Connor also assisted in the hiring of on-air personnel, interviewing job applicants. After KLUA commenced broadcast operations Ms. O'Connor became an account executive for the station. As an account executive Ms. O'Connor was responsible for the sale of advertising time on the station and station promotions. As a part-time employee since September 1992 Ms. O'Connor has continued to work on station promotions.

Nelson R. Parker will work full-time (at least 40 hours per week) as Sales Manager of KR's station, terminating his then current employment if KR's application is granted. Mr. Parker will have responsibility for supervising the sales staff and implementing station sales policies, which he will develop in coordination with the station's general manager (Ms. O'Connor). Mr. Parker will recruit and hire the station's sales staff in

¹ Kamuela and Waimea are different names for the same community. Kamuela is the name used in Ms. O'Connor's mailing address.

consultation with the general manager, be responsible for retaining and working with national or regional sales representatives, and review and coordinate the sales efforts of the station's sales staff. It is also anticipated that Mr. Parker will participate in the sale of broadcast time on behalf of selected clients.

Mr. Parker will claim credit for minority ownership as an Asian-American, past local residence from 1987 to the present, civic involvement, and past broadcast experience.

Mr. Parker's past local residence is as follows:

1987-1988 - Nob Hill Apartment, Kamuela (Waimea)

1988-1991 - Hawaiian Homes Land, Kamuela

1991-1992 - Ahuli Circle, Kamuela

1992-present - Tamarak Pines Apartments, Highway 11,
Kamuela

Mr. Parker's civic involvement in Waimea and the service area includes the following:

Member of the Aloha Week Committee, also participating in the Community Aloha Week Parade (1989-1992), with scheduled participation as the Master of Ceremonies for 1993.

Master of Ceremonies at the Keauhou May Day (Lei Day) Celebrations (1991, 1992, and scheduled for 1993).

Participating speaker in Career Day at the Kealakehe and other local schools concerning careers in radio broadcasting since 1991.

Master of Ceremonies for Salvation Army Benefit (1991-1992).

Assisted in promoting and building a community playground in Kamuela built by the community, including serving as master of ceremonies for a two week period until completion of the play-ground (1992).

Assisted in promoting and served as master of ceremonies

for non-profit fund raiser canoe race for the Community Canoe Clubs (1991-1992).

Served as master of ceremonies and promoted food drive for the Hawaii Food Bank's annual food drive (1991-1993).

Master of Ceremonies for the Big Island Aids Project Benefit Concert with Kenny Loggins (1992).

Master of Ceremonies for Kona High School Annual Song Contest (1992).

Master of Ceremonies for Rough Riders Rodeo Club Benefit Concerts to raise money for the youth rodeo state tour (1991-present).

Promoted and served as master of ceremonies for benefit concert to rebuild a children's play-ground at Liliuokalani Subdivision in Kailua-Kona (1992).

Participation in numerous fund raising events for the American Heart Association (1991-present).

Promoted and served as master of ceremonies for Super Kids Special Olympics for the American Cancer Society (1992, 1993).

Promoted and served as master of ceremonies for a Kamuela YMCA fund-raiser to finance the construction of a new building for the YMCA (1991).

Mr. Parker's past broadcast experience includes the following:²

1984-1989 - On-air announcer (including production voice overs) for KKBG(FM), Hilo, Hawaii.

1989-1990 - On-air announcer (including production voice overs) for KWXX(FM), Hilo, Hawaii.

August 1991-present - Program Director, account executive and on-air announcer for KLUA(FM), Kailua-Kona, Hawaii. In addition to performing an on-air program, for much of 1992 Mr. Parker sold advertising time as an account executive. Mr. Parker has served as Program Director

² Mr. Parker's dates of employment are approximate. He has been unable to obtain specific dates from his previous two employers.

since about December 1992, overseeing the selection of programming broadcast on the station, placing advertising schedules and supervising all on-air personnel, including hiring and firing responsibilities.

Neither KR Partners, nor Ms. O'Connor or Mr. Parker have any ownership interest in any media of mass communication, and neither Ms. O'Connor nor Mr. Parker serve as an officer or director, or have any other interest in any media of mass communications.

Although not a media interest of either KR or one of its partners, it is reported for purposes of full disclosure that Ms. O'Connor and Mr. James A. Fakas, the owner of KLUA(FM), Kailua-Kona, Hawaii, share the same residence. Ms. O'Connor and Mr. Fakas are not married, but do have a child.

KR will not claim any credit for a daytimer's preference.

CERTIFICATE OF SERVICE

I, Mark Van Bergh, an attorney in the law firm of Waysdorf & Van Bergh, hereby certify that I have on April 12, 1993, sent by first class U.S. mail, except as otherwise noted, copies of the foregoing "Integration and Diversification Statement" to the following persons:

Honorable Joseph P. Gonzalez*